

**BRENT ROBERTS and
REGINALD E. BLOOM, JR.,**

Defendants.

Case 3:24-cv-00927-DCK Document 67 Filed 08/21/25 Page 1 of 4

depositions of the parties' respective witnesses. In support of this Motion, Plaintiffs' state the following:

1. The Plaintiffs' Brent Roberts and Reginald E. Bloom, Jr. commenced this civil action against the Defendants on April 18, 2024. Plaintiffs initiated the present action on October 21, 2024. [DE 1] By leave of Court, Plaintiffs filed and served a First Amended Complaint on February 3, 2025. [DE 31] The Defendants have served their Answers and Motions to Dismiss. These motions, as well as Plaintiffs' motion to strike, remain pending. A Case Management Order, however, was entered in this matter on April 10, 2025. [DE 58]

2. Since that time, the parties have exchanged a first round of written discovery and Plaintiffs have sought supplementation of those responses from Defendants. Additionally, Plaintiffs have noticed five depositions and Defendants have requested that the Plaintiffs appear for their respective depositions. Thus far, Plaintiffs have only managed to schedule and take two of the five witness depositions they have noticed. Due to the other trial responsibilities of counsel for Defendants Gaston County, Gaston County Board of County Commissioners, and Stephen Zill's counsel, as well as counsel for Plaintiffs, the parties have been unable to schedule the remaining depositions for dates during August and the first weeks of September, 2025. Further, counsel for the Plaintiffs previously notified the parties of personal travel commitments and medical procedures scheduled during the period September 11 through 26, 2025 which make them unavailable for proceedings during this period of time.

3. This is a complex race discrimination action in which a number of witnesses – some, public officials – must be deposed and which has, and, will continue to involve extensive written discovery, as well as the use, by Plaintiffs, of expert witnesses. Written discovery continues to be supplemented. The parties have conferred and have attempted to reschedule many of the witness

depositions and are working collaboratively to resolve any discovery disputes without court intervention. Many of the depositions, however, will not likely occur until after the current expert report filing deadlines will expire. In this case, Plaintiffs have engaged two experts and will need additional time to provide each with both additional documentary evidence and deposition testimony in connection with their respective reports, particularly in light of the various scheduling conflicts of counsel, witnesses, and the parties themselves.

4. The parties have not previously sought any extensions of the Case Management Order. Additionally, Defendants' Motions to Dismiss, while fully briefed, remain outstanding. Further, the period of discovery has not yet expired and no trial date has been set at this time. It does not appear at this juncture that trial of this matter will be delayed.

WHEREFORE, the parties respectfully requests that this Court GRANT their Consent Motion and that it enter an Order directing the parties to complete all discovery by February 27, 2026 and that it extend the deadlines for expert reports to December 5, 2025 (for plaintiffs) and February 5, 2026 (for defendants), the mediation completion date to March 13, 2026 and the dispositive motions filing deadline to March 31, 2026.

Respectfully submitted this the 21st day of August, 2025.

/s/ Jenny L. Sharpe
Jenny L. Sharpe, Esq.
Attorney for Plaintiff
N.C. State Bar No. 13698
J SHARPE, PLLC
15720 Brixham Hill Avenue
Suite 300
Charlotte, NC 28277
Telephone: (704) 944-3272
Facsimile: (704) 944-3201
Email: sharpeattorney@gmail.com

/s/ Julie H. Fosbinder
Julie H. Fosbinder
Attorney for Plaintiffs
N.C. State Bar No. 19400
FOSBINDER LAW OFFICE
840 Seneca Place
Charlotte, North Carolina 28210
Telephone: (704) 333-1428
Facsimile: (704) 560-8600
Email: Jhanfos2@gmail.com

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically filed the parties' Consent Motion for Extension of Deadlines Contained in Case Management Order with the Clerk of Court using the CM/ECF system, which shall send notification of the filing of same to the following individuals:

Jennifer B. Milak
TEAGUE CAMPBELL DENNIS & GORHAM, LLP
Post Office Box 19207
Raleigh, North Carolina 27619-9207
Email: jmilak@teaguecampbell.com
Attorney for Defendant Brown

&

Kathleen K. Lucchesi
Daniel Q. Leake, II
JACKSON LEWIS
200 S. College Street, Ste. 1550
Charlotte, North Carolina
Email: Kathleen.Lucchesi@jacksonlewis.com
Email: Daniel.Leake@jacksonlewis.com
Attorneys for Defendants Gaston County & Zill

This the 21st day of August, 2025.

/s/ Jenny L. Sharpe
Jenny L. Sharpe, Esq.
Counsel for Plaintiffs